

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MARIO SAFFORD,)	
)	
Plaintiff,)	No. 08 C 621
vs.)	
)	
CITY OF CHICAGO,)	Judge Kennelly
Chicago Police Officers)	
ELIEL ROA, Star 8618,)	Magistrate Judge Mason
JERRY DOSKOCZ, Star 6573, and)	
Unknown Chicago Police Officers)	Jury Demand
John Does and Jane Roes 1-10;)	
)	
Defendants.)	

**DEFENDANT CITY’S AGREED MOTION TO FILE INSTANTER ITS
ANSWER TO PLAINTIFF’S COMPLAINT**

Defendant City of Chicago (“City”), by its attorney, Mara S. Georges, Corporation Counsel, moves this honorable court to allow it to submit *instanter* its Answer, Defenses and Jury Demand to Plaintiff’s Complaint, and support states:

1. In a minute order dated March 28, 2008, this Court set dates for the Defendants to answer Plaintiff’s Complaint, with Defendant City to answer by April 7, 2008.
2. Due to undersigned counsels scheduling oversight, the City did not timely file its answer.
3. This scheduling oversight which resulted in this late filing was not done with th intention to prejudice the plaintiff or in any way delay the proceedings. Therefore, undersigned counsel respectfully asks this court to accept the City’s attached answer to Plaintiff’s complaint, and apologizes for any delay this may have caused.
4. The undersigned counsel has spoken with plaintiff’s counsel and plaintiff has no

objection to this motion.

WHEREFORE, the City respectfully requests allow it to submit instanter its Answer, Defenses and Jury Demand to Plaintiff's Complaint.

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel of the City of Chicago

By: /s/ Helen C. Gibbons
HELEN C. GIBBONS
Assistant Corporation Counsel

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Chicago, Illinois 60602
312-742-3541
Attorney No. 6292881

CERTIFICATE OF SERVICE

I hereby certify that I have caused true and correct copies of the above and foregoing Motion and Notice of Motion to be served upon all parties of record pursuant to ECF, in accordance with the rules of electronic filing of documents, on this 14th day of April, 2008.

/s/ Helen C. Gibbons
HELEN C. GIBBONS